

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS

FRANCIS X. MOORE,)	
)	
Plaintiff,)	
)	
v.)	Civil No. 04-10922-DPW
)	
INTERNAL REVENUE SERVICE)	
(UNITED STATES GOVERNMENT),)	
)	
Defendant.)	

UNITED STATES' ASSENTED TO MOTION
TO EXTEND DISCOVERY DEADLINE

The United States moves this Court to extend the discovery deadline currently set for January 7, 2004. Plaintiff Francis Moore assents to this motion. As grounds for this motion, the United States asserts that additional time is needed to complete depositions. The United States anticipates taking approximately four depositions in this matter, and, because of the upcoming winter holiday season, would like to avoid having to schedule these depositions during the end of December and the early part of January for the benefit of counsel, the parties, and the non-party deponents. In addition, counsel for the United States is scheduled to be in Cincinnati, Ohio for the week of January 3-7, 2005, making it very difficult to complete these depositions within the scheduled period.

As a result, the United States requests that the discovery deadline be extended from January 7, 2005, to February 11, 2005. In addition, because of this change to the discovery schedule, the United States requests that the dispositive motion deadline also be extended to March 14, 2005, with responses due April 14, 2005.

I hereby certify that a true copy of the above document was served upon (each party appearing pro se and) the attorney of record for each other party by mail on

12/7/04 - Lydia Bottome Turanchik

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

BARBARA HEALY SMITH
Assistant United States Attorney

/s/ Lydia Bottome Turanchik
LYDIA BOTTOME TURANCHIK
Trial Attorney, Tax Division
U.S. Department of Justice
Post Office Box 55
Ben Franklin Station
Washington, D.C. 20044
Telephone: (202) 307-6560
Lydia.D.Bottome@usdoj.gov